Dear Michael –

Detailed below is a list of items that the City has requested from the USEPA regarding the Allied Site.

1. Acreage of various portions associated with OU-1

    a. Landfill Area – current and future (based on implementation of Alternative 2B)

    Response: The current acreage of OU1 is 89 acres (111 acres including Panelyte). Alternative 2B would leave a landfill of approximately 45 acres.

    a. Total acreage that will be available for development (based on implementation of Alternative 2B)

    Response: Implementation of OU1 would allow for industrial/commercial reuse at the Panelyte Site (22 total acres), the former Lyondell property north of Panelyte (3.5 acres) and parts of Monarch (approximately ½ of its 6.9 acres)

    b. Green space associated with Portage Creek/potential trail way

    Response: Implementation of Alternative 2B will create green space along Portage Creek. Outside of he landfill footprint, those areas not used for industrial/ commercial would be available as green space. Currently, there are fences restricting access to OU1 in between Portage Creek and the properties adjacent to the east. With alternative 2B, the fences will be along the landfill, west of Portage Creek thus allowing access to Portage Creek.

2. Panelyte Site

    a. Availability of "comfort letter" to facilitate potential City ownership of site
    b. Access to site – current and future

    Response: EPA plans to incorporate Panelyte into OU1 and address contamination as a part of the OU1 Record of Decision. EPA will then either cleanup or oversee the the cleanup of Panelyte to industrial/commercial levels. Concurrently, EPA will work with the city in its efforts to acquire the Panelyte Property.

3. Western Disposal Area (WDA) of OU-1

    a. Rationale behind assumptions that the Western Disposal Site does not pose significant future contamination risk

Response: Large amounts of paper residuals are in the WDA. Based upon our understanding of the paper residuals at OU1, EPA expects to find contamination (PCBs, inorganics and low levels of SVOCs) there, similar conditions in the HRDL and FRDL areas. EPA also expects the contamination to be bound up in the paper residuals and not readily migrate out of it via groundwater. Accordingly, EPA believes that the risks posed by materials in the WDA can be addressed in the same ways as the contamination in other parts of OU1.

b. Documentation supporting this rationale including:

Response: Information supporting these assumptions can be found in the 2008 Remedial Investigation (RI). Section 4 of the RI discussed the nature and extent of contamination which includes the WDA. Figure 5 of the RI shows the soil data collection locations and Figure 8 shows the hydrogeologic sampling locations. Tables 4-2A (CD) through 4-4D (CD) show the detections in the soil and groundwater with denotation of those samples collected in the WDA.

i. Soil borings

Response: PCBs and metals are both found in WDA soil borings. PCBs range from very low levels to 2500 ppm. Metals above Michigan Part 201 cleanup levels are found in the WDA, but based upon EPA's TCLP testing at OU1, they are most likely not at characteristic hazardous

i. Groundwater monitoring

Response: Groundwater monitoring data does not indicate that a plume of either PCBs or Metals is migrating from the WDA at levels that pose a significant risk. Further, implementation of alternative 2B would further reduce the risk of contaminants migrating from the WDA via groundwater.

ii. Well logs/data

Response: Boring logs for the WDA are included in attachment B

iii. Historical information/data associated with disposal of materials at this location

Response: There are historical anecdotes suggesting that drums were disposed of in the WDA. Despite this anecdotal information,

the soil and groundwater investigations did not show indications of drums or other wastes having been disposed of in the WDA. The March 2010 Category N Baseline Environmental Assessment For Former Panelyte Property and its appendices states that there are drums in the Panelyte Marsh. If drums or other wastes are encountered, EPA will dispose of those wastes properly. Additionally, if based upon future monitoring EPA identifies unmitigated risks associated with the WDA, EPA will address those risks.

4. Cork Street Landfill

    a. Availability/Possibility of reducing groundwater monitoring frequency
    b. Oversight by USEPA – long-term contacts, etc....

    Response: Moving forward, EPA will be more responsive to Kalamazoo on the Cork Street Landfill. Additionally, having the same EPA project manager on both Allied Landfill and Cork Street Landfill should help realize Kalamazoo's vision of a more comprehensive and integrated picture of groundwater flow and conditions in Kalamazoo.

5. Operational Costs

    a. Current Operation & Maintenance (O&M) costs associated with OU-1 (inclusive of groundwater management/monitoring)

    Response: The ongoing maintenance at OU1 includes operation of the groundwater collection and treatment system and maintenance of the property.

    b. Projected O&M costs (inclusive of groundwater monitoring) at OU-1 (based on implementation of Alternative 2B)

    Response: Over a 30 year per period, EPA estimates the costs for O&M (including gas and groundwater monitoring by not including groundwater collection and treatment) to be $3M.

    c. Comparative O&M costs at other existing "waste in place" landfills such as King Highway, and 12th Street in Otsego

    Response: O&M costs for 12th Street Landfill and King Highway Landfill (both OUs of the Kalamazoo Site) are attached.

    d. Locations of other similar "waste in place" PCB landfills outside of the State of Michigan (and associated O&M costs)

e. *Response: EPA is still gathering examples of PCB landfills with conditions similar to those at the Kalamazoo Landfills and will get back to the city with examples.*

f. Oversight of long-term maintenance

Response: MDEQ is responsible for the long-term O&M of OU1.

g. Long-term ownership of site

Response: Regardless of the long-term ownership, EPA will be monitoring the protectiveness of the remedy at OU1 through the 5 Year Review process. If EPA determines that the remedy ceases to be protective, EPA will make sure that actions are taken to address the risk.

6. Bankruptcy Trustee Financial Information

a. Current balance in OU-1 Site Trust
b. Current and projected oversight costs associated with the Trust
c. Access to ongoing Trust financial statements
d. If these are not available directly, information on this information can be accessed

Response: EPA has attached a recent statement from the Trust showing 2011 and 2012 costs. Please note that these costs include operation and maintenance of a groundwater pump and treat that would be removed without replacement in alternative 2B. The Trust is currently revising its 2013 costs for OU1. When EPA has these revised costs, EPA will share them with the city of Kalamazoo. EPA should be able to provide you with Trust statements moving forward.

7. Status of tour of USEPA Research & Development (R&D) sites for Mayor Hopewell

Response: Attached is a list of web pages for various EPA labs and research facilities. Chuck Maurice of Region 5 would be happy to arrange appointments for Mayor Hopewell at any of these labs. Chuck can be contacted at Maurice.charles@epa.gov or (312) 886-6635